



Department of Energy

Washington, DC 20585

July 7, 2003

Vice Admiral George P. Nanos
[]
Los Alamos National Laboratory
P.O. Box 1663
Los Alamos, NM 87545

Subject: Los Alamos National Laboratory Enforcement Letter

Dear Admiral Nanos:

The Office of Price-Anderson Enforcement (OE) is concerned that nuclear safety at the Los Alamos National Laboratory (LANL/Laboratory) continues to demonstrate a negative performance trend. Our observations are based on numerous recent events involving both nuclear safety and radiological control issues.

Since our last discussions at the March 2003 LANL Price-Anderson Amendments Act Enforcement Conference, my office has reviewed numerous nuclear safety and radiological events as part of enforcement action follow-up and monitoring. The events have been characterized as follows:

I. Work Control Breakdowns:

In May of this year, personnel received minor uptakes and a non-radiological area became inadvertently contaminated with tritium during removal of copper piping installed within the Ion Beam facility. The piping was removed because it obstructed the ongoing disassembly and removal of other equipment in the room. The pipe removal activities were performed under a general facility work order and instruction that did not specifically authorize nor address pipe removal (see NTS-ALO-LA-LANL-2003-0013).

The above event appears similar to the March 2002 LANL event involving the unauthorized and uncontrolled size reduction of [] contaminated piping cited in Enforcement Action EA-2003-02. In both cases, site work control processes were circumvented as a result of in the field changes in work scope. OE is concerned that LANL corrective actions as a result of the enforcement action did not prevent the above occurrence. In addition, a recently submitted LANL NTS Report documents eight additional events related to inadequate work controls and six events involving failure to follow procedures (see NTS-ALO-LA-LANL-2003-0014).

II. Reoccurring [] Airborne Releases:

Technical Area [] has experienced several events during the first six months of this year resulting in elevated airborne radioactivity levels as reported in occurrences ALO-LA-LANL-[]-2003-0010, -0011, -0012, -0013, -0014, and -0016. The events have resulted in both personnel and room contaminations. Although the direct cause of the majority of these events appear to be random glove-box glove failures, OE is concerned that the frequent and repetitive nature of these events is indicative of both quality improvement and programmatic work control issues.

III. Safety Basis Implementation Issues:

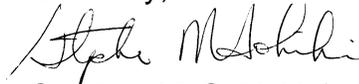
In June of this year, an event occurred in which the nuclear inventory of [], a designated radiological facility, was found to have exceeded the minimum threshold for a Hazard Category III nuclear facility. The direct cause involved a non-conservative calculation error concerning the activity of a [] sample stored within the facility.

Normally, these events would have triggered additional formal investigation by this Office, particularly due to their repetitive nature, and the systemic problems they represent. However, I was encouraged by your personal commitment during the recent enforcement conference to address these systemic issues and the specific steps you discussed related to the implementation of comprehensive corrective actions. I recognize that the senior management changes that have been made at the Laboratory, and the implementation of the other changes that you have put in motion, will require a reasonable time period to produce the positive results that we all desire, i.e., a consistent, proactive approach to nuclear safety performance at all levels of the organization.

In recognition of the above, I do not believe that further formal investigation at this time would serve a useful purpose. Therefore, because of your personal commitment and positive first steps toward resolving the types of systemic issues discussed in this letter, OE will exercise enforcement discretion on these matters consistent with DOE's enforcement policy. However, you should understand that OE will consider recommending the use of escalated enforcement action in the future if non-compliances with DOE's nuclear safety rules occur at the Laboratory.

While no response to this letter is required, I am available to discuss with you the issues and events highlighted in this letter. Should you have any questions, please contact me at (301) 903-0100.

Sincerely,



Stephen M. Sohinki

Director

Office of Price-Anderson Enforcement

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